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October 3, 1997

Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator
U.S. Fish and Wildlife Service
P.O. Box 5127
Missoula, MT 59806

RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR
COORDINATORS OFFICE

OCT 08 1997

Dear Dr. Shervheen:

The Idaho Department of Parks and Recreation Trails Program has reviewed the Draft EIS for Grizzly Bear Recovery in the Bitterroot Ecosystem. Our program functions to support the provision of appropriate access to recreation resources. We work to support the conservation of significant natural resources by facilitating the designation, design, development and maintenance of trails to accommodate public use. Our program works closely with land management agencies and user groups to disperse information and promote safe and enjoyable trail opportunities.

In our view, the preferred Alternative 1 has the possibility of affecting trail-based recreation, especially off-highway vehicle recreation within the Bitterroot Grizzly Bear Experimental Area. On page xvii of the summary, the summary states "There would be no anticipated impacts to land use activities on public or private land to include timber harvest, mining, and public access/recreational use.", however, our department does see the potential for some impacts to public access/recreational use.

While Alternative 1, offers more flexibility in the management of the bears than the other reintroduction alternatives, we are concerned about the authority of the Citizen Management Committee. On page xv of the summary, the summary states "If the Secretary determines, through his/her representative(s) on the Committee, that decisions of the Committee, management plans, or implementation of those plans are not leading to recovery of the grizzly bear within the experimental population area, the Secretary's representative on the Committee shall solicit from the Committee a determination whether the decision, the plan, or implementation of the components of the plan are leading to recovery. Notwithstanding, etc., In such case, the Committee would be disbanded and all requirements identified in this rule regarding the Committee would be automatically nullified." Basically, what this paragraph says is, if the Committee makes a decision that the U.S. Fish and Wildlife Service doesn't believe is right, that the USFWS may disband the committee. This rule undermines the Committee's value.

Alternative 1 would ban toxicants lethal to bears within the recovery and experimental population areas. The Forest Service currently uses toxicants to control rodents within newly reforested areas. Would this practice be allowed to continue within the experimental population area? If not, what cost-effective methods could be used to control rodent population in newly reforested areas?

On Page xv of the Summary, the EIS states "The CMC would be responsible for recommending changes in land-use standards and guidelines as necessary for grizzly bear management." These changes in land-use patterns, depending on what the CMC recommends, could affect public access/recreational use and trail use, especially off-highway vehicle use. The CMC shouldn't have any more power than any other organized group when it comes to recommending changes in land-use standards and guidelines.

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- 4 The Summary needs to reconcile the costs of implementing Alternative 1. On Page xvi of the Summary, the costs are estimated to be \$393,632/year for the first five years, and on Page xvii of the Summary the costs are estimated to be \$395,892-\$401, 635/year for the first five years. Which estimate is correct? These numbers need to be reconciled to match each other.
- 5 On Page xvii of the Summary, Alternative 2 The No Action Alternative - Natural Recovery states "The USFWS would have management authority for all aspects of grizzly bear recovery." How is that different from Alternative 1? Under Alternative 1, the USFWS still has the final word on any committee recommendations that would affect grizzly bear management.
- 6 On Page xxi of the Summary, a technical correction needs to be made. The recovery area boundary is described as "the westernmost boundaries of the Nez Perce National Forest and Payette National Forests west of U.S. Highway 95 and Idaho Highway 55". Is the USFWS planning to place grizzlies in the Seven Devils/Hells Canyon area? From the description above, it looks like it does. The westernmost boundary is *east* not west of U.S. Highway 95 and Idaho Highway 55.
- 7 The summary on the expected actions and effects on Alternative 4 on Page xxiii has a sentence that may be misleading. The summary states "Public access could be negatively impacted due to proposed road closures, however, backcountry recreation opportunities could be enhanced by the road closures. Our program disagrees with that statement. Public access would be negatively impacted because 3,500 miles of roads, including main well-traveled roads to popular recreation areas would have to be closed in order to meet the 0.25 miles per square mile road densities within the recovery zone. Backcountry recreationists would no longer be able to reach the center of the Frank Church River of No Return Wilderness and the Selway-Bitterroot Wilderness because of the elimination of the Hells Half Acre Road and the Magruder Corridor Road. Of all the alternatives, Alternative 4 is the least desirable alternative in our program's view.
- 8 The section of Recreation Use starting on page 3-31 uses the 1990 Idaho State Comprehensive Outdoor Recreation Plan for determining growth in recreation use. Much of the data to obtain the growth is based on the 1986/87 Pacific Northwest Outdoor Recreation Survey. The Grizzly Bear Recovery in the Bitterroot Ecosystem fails to note the Off-highway vehicle use is also expected to have moderate growth to the year 2010. Last year, our off-highway motorbike/ATV registrations grew 18%. Our program recommends that the Fish and Wildlife Service use our new 1997 Idaho Comprehensive Outdoor Recreation and Tourism Plan for more up to date information in the final report.
- 9 On Page 4-15, the Draft EIS in the Trail and Road Closures section states "This alternative allows for a citizens management committee to decide if trails, roads, and other areas would be closed to improve recovery efforts for grizzly bears." Our program is opposed to giving this power to the USFWS or a citizen management committee. Every road closure should be subject to public input and the NEPA process. Idaho's citizens should have the right to help determine if roads should be closed.
- 10 On Page 4-38, when the Draft EIS covers the impacts on Trail and Road Closures under Alternative 2, the authors of the draft EIS fail to recognize that natural recolonization is unlikely. If recolonization efforts don't occur, there wouldn't be a need for trail and road closures.

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11 On Page 4-39, the Draft EIS states in the Economic Effect of Land Use Restrictions, "Economic losses associated with these restrictions, however, would likely be more than offset by improvements in recreational opportunities for hunters and fishermen from habitat improvements and reduced sedimentation rates in roaded areas." While the restrictions would offer habitat improvements, the road closures could reduce access by the general recreationists, meaning a loss in jobs for both the resource and tourism industry, however, road closures would be unlikely since the bears would probably not recolonize outside their present range.

12 On Page 4-51, under the Impacts on Public Access and Recreational Use the draft EIS states "There might be a slight decrease in visitor use under this alternative as compared with Alternative 1 due to restricted access from the proposed road closures. This may be offset, however, by an increase in visitors seeking a remote backcountry experience." Alternative 4 would eliminate 3,500 miles of road within the recovery area. This would make many backcountry scenic areas that are popular now unavailable to the recreationists because of their time limitations. In addition, these roads provide access for fishing, hunting, and driving for pleasure on National Forest lands. The draft EIS fails to state whether these closed roads would be available for off-highway vehicle (OHV) use. From our previous experience, in the USFWS comments on land management plan revisions, OHV use would not be allowed on these closed roads. This alternative would effectively kill the OHV recreation industry in Central Idaho.

13 On Page 4-52, the draft EIS expects that there would be no trail closures under Alternative 4. Would this apply to all recreational trail users including OHV recreationists? From our previous experience we would expect the USFWS to try to close many trails currently available for OHV recreation.

Thank you for the opportunity to comment on this proposal. If you have any questions about our comments, please contact Jeff Cook, Trails Program Coordinator at (208) 334-4180 ext 230.

Sincerely,



Chuck Wells
Trails Program Supervisor